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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

HOLLISTER CONSTRUCTION
SERVICES, LLC,¹

Debtor.

Chapter 11

Case No. 19-27439 (MBK)

Re: Docket Nos. 692 and 730

**DECLARATION OF BRUCE BUECHLER IN SUPPORT OF DEBTOR'S REQUEST
FOR ATTORNEYS' FEES AND COSTS IN CONNECTION WITH THE COURT'S
JANUARY 2, 2020 ORDER GRANTING DEBTOR'S MOTION FOR ENTRY OF AN
ORDER DETERMINING THAT CERTAIN CREDITORS HAVE VIOLATED THE
AUTOMATIC STAY, THAT CERTAIN ASSERTED LIENS FILED POST-PETITION
ARE VOID AB INITIO, AND GRANTING RELATED RELIEF**

Bruce Buechler, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the law firm of Lowenstein Sandler LLP, counsel for Hollister Construction Services, LLC, the above referenced debtor-in-possession (the "Debtor").
2. This Declaration is submitted in support of the Debtor's request for attorneys' fees and costs in connection with the *Debtor's Motion for Entry of an Order Determining That Certain Creditors Have Violated the Automatic Stay, That Certain Asserted Liens Filed Post-*

¹ The Debtor in this chapter 11 case and the last four digits of its taxpayer identification number is: Hollister Construction Services, LLC (5404).

Petition are Void Ab Initio, and for Related Relief (the “Motion”)[Docket No. 692]. After a hearing on the Motion held on January 2, 2020, the Court entered an *Order Granting the Debtor’s Motion Determining That Certain Creditors Have Violated the Automatic Stay, That Certain Asserted Liens Filed Post-Petition are Void Ab Initio, and Granting Related Relief* on January 2, 2020 (the “Order”) [Docket No. 730].

3. Paragraph 4 of the Order granted the Debtor the right to submit a declaration of the attorneys’ fees and costs it incurred in the preparation, filing and prosecution of the Motion to be assessed against Midway Glass & Metal Installers, Inc. and Multi Roof Maintenance, LLC under section 362(k) of the Bankruptcy Code for willful violation of the automatic stay.

4. Attached hereto as Exhibit A is an itemization of the attorneys’ fees incurred by the Debtor in the preparation, filing and prosecution of the Motion. The costs are the costs incurred by Prime Clerk, the Debtor’s claims and noticing agent, for copying and serving the Motion, which were \$1,754.25. The Debtor requests that the Court enter an further order awarding it attorneys’ fees in the amount of \$9,200.00 as itemized on Exhibit A hereto, and costs in the amount of \$1,754.25, for a total of \$10,954.25, jointly and severally, against against Midway Glass & Metal Installers, Inc. and Multi Roof Maintenance, LLC under section 362(k) of the Bankruptcy Code for willful violation of the automatic stay.

5. I declare under penalty of perjury that to the best of my knowledge, information and belief, that the foregoing is true and correct.

Dated: January 7, 2020

/s/ Bruce Buechler
Bruce Buechler, Esq.
Member, Lowenstein Sandler, LLP
Counsel for Debtor
Hollister Construction Services, LLC

EXHIBIT A

Date	Name	Bs Hrs	Amount	Narrative
12/4/2019	Buechler, Bruce	0.5	\$447.50	Review liens on the Mercedes Benz project and draft stay violation letters to the two entities that filed post petition liens
12/4/2019	Buechler, Bruce	0.6	\$537.00	Revise motion to void certain post-petition construction liens
12/9/2019	Buechler, Bruce	0.2	\$179.00	Draft stay violation letter to Multi Roof
				Exchange e-mails with J. McDermott and C. Johnson re: post-petition lien claimants concerning the Mercedes-Benz
12/12/2019	Buechler, Bruce	0.3	\$268.50	settlement
12/12/2019	Buechler, Bruce	0.4	\$358.00	Revise draft motion seeking order avoiding certain post-petition construction liens
				Revise motion to avoid certain liens and proposed form of Order; draft and revise Declaration of J. McDermott in support of said motion
12/13/2019	Buechler, Bruce	1.2	\$1,074.00	Office conference with M. Seymour regarding Janus proposed settlement for New York job and other open projects
12/13/2019	Buechler, Bruce	0.2	\$179.00	Phone call with B. Murray regarding liens on Mercedes project
12/13/2019	Buechler, Bruce	0.1	\$89.50	Exchange e-mails with B. Murray regarding liens on the Mercedes project
12/13/2019	Buechler, Bruce	0.2	\$179.00	Draft e-mail to J. McDermott re: his Declaration
12/16/2019	Buechler, Bruce	0.2	\$179.00	Exchange e-mails with J. McDermott of Hollister re: his declaration
				Draft and revise application and order shortening time in connection with motion seeking approval of the Mercedes settlement agreement
12/16/2019	Buechler, Bruce	0.4	\$358.00	Further revisions to motion and proposed form of order seeking a determination that certain post-petition liens are void and for related relief
12/17/2019	Buechler, Bruce	0.7	\$626.50	Revise motion and order seeking to void certain post-petition construction liens
12/20/2019	Buechler, Bruce	0.4	\$358.00	Make final revisions to motion to void certain post-petition filed liens and have motion filed
12/20/2019	Buechler, Bruce	0.1	\$89.50	Exchange e-mails with E. Lawler re: service of motion to void certain post-petition liens
				Finalize and e-file motion determining that certain creditors have violated the automatic stay (.3), and related application and order shortening time (.2); prepare e-mail to chambers re: same (.2) review entered order
12/20/2019	Lawler, Beth	0.9	\$250.00	shortening time and coordinate service of same (.2)
1/2/2020	Buechler, Bruce	4	\$3,580.00	Travel to and attend court hearing on motion
Totals		10.9	\$9,200.00	

Buechler rate - \$895.00 per hour

Lawler rate (paralegal) - \$250.00 per hour

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